## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION – DETROIT

In the matter of THE CITY OF DETROIT, MICHIGAN Case No. 13 53846 swr HONORABLE STEVEN W. RHODES

## CORRECTED INDIVIDUAL / CREDITOR / CLAIMANT HEIDI PETERSON'S DISCOVERY REQUESTS

## [DEPOSITIONS PROPOSED]

These discovery requests are directed to the appropriate persons through the attorneys for the Chapter 9 debtor, David Heiman at Jones Day, Attorneys at Law, 901 Lakeside Avenue, Cleveland, Ohio 44114.

Having been apprised that The Court will allow a maximum of six hours for deposition the various requests below and follow up questions based on each depending upon how they are answered would be directed at the following deponents: Kevin Orr, the emergency financial manager; members of the board who review city of Detroit and county of Wayne property taxes; the federal judge who dismissed Peterson's earlier case involving her losses suffered at the hands of an unfettered squatter allowed by the city to damage Peterson and her property and to get away with it unpunished; Detroit news writers; decisions makers at the water board; expert witness who would show that the city never made a good faith effort to bargain with its creditors in order to reach settlements.

Dated: 8/24/2013

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